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6 *Attorney for Plaintiffs*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 ***

10 TAYLOR SOMMER, individually; TAYLOR
11 SOMMER, as the Administrator of the ESTATE
12 OF REINER SHAWN SOMMER, deceased,

13 Plaintiffs,

14 vs.

15 CITY OF LAS VEGAS, NEVADA, a political
16 subdivision of the State of Nevada; LAS
17 VEGAS METROPOLITAN POLICE
18 DEPARTMENT, a political subdivision of the
19 State of Nevada; KEVIN McMAHILL,
20 individually and as a policy maker and Sheriff of
21 LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT; SERGEANT GERALD
23 BAGAPORO, individually and in his official
24 capacity; SERGEANT JEFFREY BLUM,
25 individually and in his official capacity;
26 OFFICER ANDREW GARCIA, individually
and in his official capacity; OFFICER JOSEPH
ORTEGA, individually and in his official
capacity; DOE LAS VEGAS METROPOLITAN
POLICE DEPARTMENT SUPERVISORS I
through X, inclusive; ROE LAS VEGAS
METROPOLITAN POLICE DEPARTMENT
OFFICERS XI through XX, inclusive,

27 Defendants.
28

Case No.: 2:23-cv-01682-GMN-NJK

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION FOR PARTIAL
DISMISSAL [ECF #6] (SECOND
REQUEST)**

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COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*, “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; KEVIN McMAHILL; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and through their undersigned counsel of record, and hereby stipulate and agree as follows:

1. The Defendants hereto filed a Motion for Partial Dismissal on November 7, 2023 [ECF #6].
2. On November 17, 2023, the parties submitted a stipulation to extend the due date for the Plaintiff’s Opposition until December 8, 2023. [ECF #9]. Said stipulation was granted on the same date. [ECF #10].
3. In addition to the Thanksgiving holiday and the family obligations associated therewith, Plaintiff’s counsel has been required to prepare for a Business Court trial that commences on Monday, December 11, 2023. Preparation for this trial has been extremely time consuming and has taken significantly longer than anticipated.
4. Based upon the foregoing, Plaintiffs’ counsel has requested and shall be granted an additional extension of time in which to respond to Defendants’ Motion to Dismiss until December 18, 2023.

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5. This Stipulation is made in good faith and not for purpose of delay.

DATED this 6th day of December, 2023.

ROGER P. CROTEAU & ASSOCIATES, LTD.	MARQUIS & AURBACH
<p><u>/s/ Timothy E. Rhoda</u></p> <p>ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 West Charleston Blvd., #67 Las Vegas, Nevada 89102 702-254-7775 croteaulaw@croteaulaw.com <i>Attorney for Plaintiffs</i></p>	<p><u>/s/ Craig R. Anderson</u></p> <p>CRAIG R. ANDERSON, ESQ. Nevada Bar No. 6882 10001 Park Run Drive Las Vegas, Nevada 89145 702-382-0711 canderson@maclaw.com <i>Attorney for Defendants</i></p>

ORDER

IT IS SO ORDERED.

Dated this 8 day of December, 2023,


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of December, 2023, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR PARTIAL DISMISSAL [ECF #6]** **(SECOND REQUEST)** to the following parties:

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/s/ Timothy E. Rhoda

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